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July 15, 2015

Stephanie Vaughn 17-mile LPRSA RI/FS Remedial Project Manager U.S. Environmental Protection Agency, Region 2 290 Broadway New York, NY 10007-1866

Via Electronic Delivery

Re: COPC Mapping White Paper Initial Reply — May 2007 Administrative Agreement and Order on Consent for Remedial Investigation/Feasibility Study – CERCLA Docket No. 02-2007-2009 (AOC)

Dear Ms. Vaughn:

This letter represents an initial response by the Lower Passaic River Cooperating Parties Group (CPG) to USEPA Region 2's (Region 2) "Review of the Cooperating Parties Group Approach to Mapping Contaminants of Potential Concern" (White Paper) provided to the CPG on June 10, 2015. The White Paper was provided to the CPG three working days in advance of the planned meeting on June 16 between Region 2 staff, USEPA Headquarters representatives and the CPG. Due to both the complexity of the issues discussed in the White Paper and the short time period between Region 2 providing the White Paper and the planned meeting, the CPG requested that the meeting be postponed in order for the CPG and its consultants to fully review the document.

In addition, the Region's White Paper lacked any attachments or appendices documenting the underlying work presented in it. As such, the CPG requested in its June 12, 2015 email that Region 2 "provide all underlying documentation (e.g., data sets, spreadsheets, input and output files etc.) that were used to produce this [White] [P]aper" and "the results of any simulations runs in support of Sections 6.2 and 6.3 of the [White] [P]aper beside the results discussed in the paper." The Region subsequently indicated that the supporting material would be available no sooner than July 9, 2015.

The CPG has a number of concerns with Region 2's White Paper. A full and complete elaboration of the CPG's concerns will be provided following receipt and review of the



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Region's supporting material, which is needed in order to fully evaluate the substance of the white paper. The CPG stands by its interpretation of the data and use of the mapping as an appropriate approach and methodology to support the evaluation of alternatives in the 17-mile FS, and is prepared to quantitatively demonstrate the flaws in the White Paper and its failure to consider the system understanding detailed in the 17-mile RI Report.

The CPG requests that Region 2 include this letter into the Administrative Record for the 17-mile LPRSA Operable Unit of the Diamond Alkali Superfund Site.

Please contact Bill Potter or me with any questions or comments.

Very truly yours,

de maximis, inc.

Robert H. Law, Ph.D CPG Project Coordinator

cc: Ray Basso, EPA Region 2
Walter Mugdan, EPA Region 2
Sarah Flanagan, EPA Region 2
James Woolford, EPA HQ
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